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*Attorneys for Sonos, Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

GOOGLE LLC,  
  
Plaintiff and Counterdefendant,  
  
v.  
  
SONOS, INC.,  
  
Defendant and Counterclaimant.

Case No. 3:20-cv-06754-WHA  
Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF GEOFFREY MOSS  
IN SUPPORT OF SONOS, INC.'S  
MOTION FOR LEAVE TO AMEND  
INFRINGEMENT CONTENTIONS  
PURSUANT TO PATENT L.R. 3-6**

Date: Jan. 12, 2023  
Time: 8:00 a.m.  
Place: Courtroom 12, 19<sup>th</sup> Floor  
Judge: Hon. William Alsup

Complaint Filed: September 28, 2020

1 I, Geoffrey Moss, declare as follows and would so testify under oath if called upon to do  
2 so:

3 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel  
4 of record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good standing  
5 of the Bar of the State of California. I make this declaration based on my personal knowledge,  
6 unless otherwise noted. If called, I can and will testify competently to the matters set forth herein.

7 2. I make this declaration in support of Sonos’s Motion for Leave to Amend  
8 Infringement Contentions Pursuant to Patent L.R. 3-6.

9 3. Attached as **Exhibit 1** is a true and correct copy of Sonos’s proposed amended  
10 infringement contentions for U.S. Patent No. 10,799,033 (“the ’033 patent”) that shows all of the  
11 proposed changes in redline. The full and complete proposed amended infringement contention  
12 chart for the ’033 patent was served on Google’s counsel on November 21, 2022.

13 4. Attached as **Exhibit 2** is a true and correct copy of Sonos’s initial infringement  
14 contention chart for the ’033 patent served on December 11, 2020 in what is now the -7559 case.

15 5. Attached as **Exhibit 3** is a true and correct copy of Plaintiff’s First Set of Fact  
16 Discovery Interrogatories to Defendants dated on August 7, 2021. These requests were served  
17 while the -7559 case was still pending in the Western District of Texas.

18 6. Attached as **Exhibit 4** is a true and correct copy of Google LLC’s Third  
19 Supplemental Objections and responses to Plaintiff Sonos, Inc.’s First Set of Fact discovery  
20 Interrogatories (Nos. 13, 14, 15) dated February 4, 2022.

21 7. Attached as **Exhibit 5** is a true and correct copy of Sonos, Inc.’s First Rule  
22 30(b)(6) Notice of Deposition of Google LLC dated January 5, 2022. Sonos subsequently served  
23 a corrected copy of that Notice in April 2022. *See* Dkt. 378-1.

24 8. Attached as **Exhibit 6** is a true and correct copy of Google LLC’s Objections and  
25 Responses to Sonos, Inc.’s January 5, 2022 Rule 30(b)(6) Notice of Deposition of Google LLC  
26 dated February 3, 2022.

27 9. Attached as **Exhibit 7** is a true and correct copy of an email thread between  
28 counsel for Sonos and counsel Google sent between March 15, 2022 and April 13, 2022.

1           10. Attached as **Exhibit 8** is a true and correct copy of an email thread between  
2 counsel for Sonos and counsel for Google sent between April 19, 2022 and June 10, 2022.

3           11. Attached as **Exhibit 9** is a true and correct copy of a letter from Cole Richter to  
4 Jocelyn Ma re Google's discovery deficiencies.

5           12. Attached as **Exhibit 10** is a true and correct copy of an email from Nima Hefazi to  
6 Cole Richter dated November 10, 2022.

7           I declare under penalty of perjury that the foregoing is true and correct to the best of my  
8 knowledge. Executed this 23rd day of November, 2022 in Los Angeles, California.

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GEOFFREY MOSS